

# NBANC

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**North American Numbering Plan  
Billing and Collection Agent**

John A. Ricker  
Chief Executive Officer

80 S. Jefferson Road  
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jricker@neca.org

May 5, 2000

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S. W.  
TW-A325  
Washington, D.C. 20554

RECEIVED  
MAY 05 2000  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

92-237

RE: NANPA Fund Administration

Dear Ms. Salas:

In accordance with 47 C.F.R. § 52.16(a), enclosed are the original and four (4) copies of the North American Numbering Plan Billing and Collection, Inc. (NBANC) submission of the updated contribution factor and fund size. The NBANC Board of Directors, by resolution at its May 4, 2000 meeting, authorized the contribution factor filed herein.

Acknowledgment and date of receipt of this letter is requested. A duplicate copy has been provided for that purpose.

Sincerely,



John A. Ricker

Enclosures

cc: John Hoffman, NANC  
Charles Keller, Network Services Division, Common Carrier Bureau  
Diane Harmon, Network Services Division, Common Carrier Bureau  
Cheryl Callahan, Network Services Division, Common Carrier Bureau  
Les Selzer, Network Services Division, Common Carrier Bureau  
ITS

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# NBANC

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ITS

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D. C. 20554**

In the Matter of:	)	
	)	
Administration of the North	)	
American Numbering Plan	)	CC Docket 92-237
	)	

**North American Numbering Plan Administration  
Revised Contribution Factor and Fund Size  
for March 2000 through June 2001**

**I. Introduction**

The North American Numbering Plan Billing and Collection, Inc. (NBANC) hereby submits revisions to the contribution factor and fund size estimate for the period March 2000 through June 2001.

NBANC, a wholly owned subsidiary of the National Exchange Carrier Association, Inc. (NECA), was established in 1998 to perform the billing and collection functions associated with cost recovery for the North American Numbering Plan Administration (NANPA).<sup>1</sup> NBANC is governed by a Board of Directors comprised of representatives from the following industry constituent groups: two representatives of domestic interexchange carriers; two representatives of domestic incumbent local

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<sup>1</sup> Administration of the North American Numbering Plan, CC Docket No. 92-237; Toll Free Access codes, CC Docket No. 95-155; *Third Report and Order*, 62 Fed. Reg. 55179 (October 23, 1997).

exchange carriers; two representatives of the competitive local exchange carriers; two representatives of the wireless carriers; two representatives of non-domestic carriers; two representatives of consumer groups; and two representatives from state and international regulatory bodies.<sup>2</sup>

NBANC is responsible, under Federal Communications Commission's (FCC or Commission) Part 52 Rules, for calculating, assessing, billing and collecting payments for numbering administration functions, and distributing funds to the North American Numbering Plan (NANP) administrator on a monthly basis.<sup>3</sup>

In its November 22, 1999 filing, NBANC indicated that after all carriers had filed the required FCC Form 499-A on April 1, 2000, pursuant to the Commission's directive, it would revise the payments for all carriers based on calendar year revenues, and would file any necessary modification to the contribution factor with the Commission in May 2000, with revised bills being issued to carriers beginning in July 2000 for the balance of the funding year.<sup>4</sup>

Included *infra* are proposed revisions to the contribution factor and, in light of recent Commission decisions with respect to implementation of thousands-block number pooling, audits and the introduction of a revised reporting mechanism for number utilization a recalculation of the total funding amount projected for Fiscal Year 2000. The North American Numbering Council (NANC) has requested that NBANC revise the amounts included in the November 22<sup>nd</sup> filing for the projected costs of audits to be performed in fiscal year 2000 and the funding of thousand-block number pooling

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<sup>2</sup> *North American Numbering Plan Administration Contribution Factor and Fund Size for March 2000 through June 2001*, filed November 22, 1999 (NBANC Report). Exhibit 1 contains a list of current NBANC Board members and their term expiration dates.

<sup>3</sup> 47 C.F.R. §52.16(a)

administration for the same period. In addition, the NANC has requested that NBANC include an additional amount for the reporting system to replace COCUS. With these revisions to the funding requirements included at the NANC's request, the proposed revised contribution factor is 0.000043.

## **II. Background**

The NANP Fund was established to compensate the NANP administrator for numbering plan and central office code administration. Recovery of the cost of NANPA comes from two sources: international participants (Canada and the Caribbean nations) and telecommunications service providers in the United States. The fund contribution for the domestic carriers is calculated after first reducing the total requirement by the portion to be contributed by Canada and the Caribbean nations. The Canadian and Caribbean nations' share of the funding is determined based on a combination of population in relation to total participating countries, and the percentage of numbering work performed for them by NANPA. No change to the \$211,563 funding requirement for Canada and the Caribbean nations is proposed in this filing, since none of the additional functions or the reporting requirements being modified herein are funded by them.

The domestic telecommunications service providers contribute the balance of the funding requirement. Section 52.17 of the Commission's rules requires all telecommunications carriers in the United States to contribute on a competitively neutral basis to meet the costs of establishing numbering administration.

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<sup>4</sup> *Id.* at page 6.

### **III. Funding Base**

In the November 22<sup>nd</sup> filing, contributions for each telecommunications carrier were based on an estimate of their billed end-user telecommunications revenues derived from the FCC Form 499-S, collected by the Universal Service Administrative Company (USAC) on September 1, 1999. The November 22<sup>nd</sup> filing estimated the revenue base to be \$270.568 Billion. Because 1999 calendar year end-user revenue data for NANPA contributions is now available, NBANC finds it necessary to adjust the revenue base to reflect calendar year 1999 end-user revenue adjusted to reflect the 16 month funding year. This adjustment yields a funding base of \$288.133 Billion.<sup>5</sup>

### **IV. Fund Requirement**

NBANC has received a request from the NANC to revise the amounts included in the November 22<sup>nd</sup> filing as additional funding requirements in its collection process from domestic telecommunications carriers for fiscal year (FY) 2000. The NANC anticipates a delay in contracting with a yet to be determined entity to perform random and for cause audits of the number administrator's activities. NANC requests that the funding requirement for audits be reduced from \$700,000 to \$350,000.<sup>6</sup> The NANC anticipates a delay in the implementation of thousand-block number pooling during FY2000 and requests that this amount be reduced from \$8.2 Million to \$4.1 Million. The NANC has also requested that an additional \$203,000 be included in the funding base to cover development and administrative costs associated with the COCUS replacement

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<sup>5</sup> Calendar year end user revenues of \$216.099 Billion were reported by telecommunications service providers on the FCC Form 499-A. This amount is adjusted by 16/12 to reflect the sixteen month funding period required for the 2000 funding year.

<sup>6</sup> May 3, 2000 Letter from John Hoffman, NANC Chair, included as Exhibit 2.

tool. Together, these requested modifications result in a reduction in the funding base for the 2000 funding year of \$4.247 Million.

The NBANC Board of Directors has reviewed the proposed revisions and authorized NBANC to submit a revised contribution factor. Given the uncertainty surrounding start dates for the audits, selection of and start up costs for the thousand block pool administrator, and the ultimate cost of the COCUS replacement tool, coupled with NBANC's inability to borrow funds to meet its commitments, the Board has requested that the Commission authorize an increase in the NBANC contingency fund from \$425,000 to \$1 million.

An increase in the NBANC contingency of this magnitude for the 2000 funding year only will provide additional assurance against the need to collect additional funds from the contributors, should the requirements for any of the unknowns change during the funding year, e.g., the start up costs for the yet to be named thousand block pool administrator exceed the funds available, or the cost of implementing a new tracking vehicle exceeds funding set aside for this function.<sup>7</sup> Exhibit 3 details all of the proposed revisions contributing to the revision in the 2000 funding year contribution factor.

## **V. Revised Contribution Amounts**

In its December 29, 1999 Order authorizing the 2000 funding year contribution factor, the Commission indicated that, should a recalculation of the contribution factor prove necessary, the Commission may direct that refunds be made to carriers.<sup>8</sup> NBANC

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<sup>7</sup> See the April 28, 2000 letter from J. Hoffman, NANC Chair, to FCC regarding cost estimate of COCUS replacement tool.

<sup>8</sup> In the Matter of Administration of the North American Numbering Plan, CC Docket No. 92-237, and North American Numbering Plan Cost Recovery Contribution Factor and Fund Size NSD File No. L-99-92, *Order*, adopted December 29, 1999, at 8.

proposes that if the Commission adopts the revised contribution factor included herein it will modify the funding period billing amounts for all contributors to reflect their required contributions based on their reported calendar year 1999 revenues. Any carrier that has already made its full contribution for the period based on the prior estimate and is found to have over-contributed will receive a refund of the difference. Any carrier that has taken advantage of the monthly installment process will receive an adjustment to future monthly billing amounts to adjust for potential overpayment of their contribution amounts. In the event that a carrier's revenue base grew to the point that it has an additional contribution requirement, in spite of the lower contribution factor, it will receive a bill requiring submission of the additional funding requirement.



#### **IV. Exhibits**

This section contains the above referenced exhibits:

- 1.) NBANC Board Member List
- 2.) May 3, 2000 Letter from J. Hoffman, NANC Chair, concerning adjustments to funding requirement
- 3.) NBANC calculation of revised Year Three domestic contribution factor
- 4.) April 28, 2000 Letter from J. Hoffman, NANC Chair, to FCC concerning cost estimate for COCUS replacement tool

# Exhibit 1

## NORTH AMERICAN BILLING & COLLECTION INC. (NBANC) BOARD OF DIRECTORS

NAME	REPRESENTING/ TERM	ADDRESS	TEL. & FAX Nos.	EMAIL
Charles A. Acquard, NASUCA Executive Director	Consumer Groups 4/98 – 3/00	1133 15 <sup>th</sup> Street, NW, Ste. 550 Washington, DC 20005	202-727-3908 202-727-3911 fax	cacquard@erols.com
Michael F. Altschul, CTIA General Counsel & Vice President	Wireless Carriers 4/98 – 3/00	1250 Connecticut Ave., NW, Ste. 200 Washington, DC 20036	202-785-0081 202-785-0721 fax	maltschul@ctia.org
Dan Gonos, WinStar Telecomm. Sr. Dir. – Regulatory Affairs - Numbering	Competitive LECs 11/99 – 10/01	6978 Cedarbrook Drive Bloomfield Hills, MI 48301-3021 (WinStar Legal/Regulatory Ofc: 1615 L Street, NW, Ste. 1260 Washington, DC 20036)	248-539-7877 248-539-7879 fax 248-866-8041 cell DC: 202-833-5678 Page: 888-983-8168	dgonos@winstar.com Alt: dgonos@flash.net
Robert Hoggarth, PCIA SVP – Paging & Messaging	Wireless Carriers 5/99 – 4/01	500 Montgomery Street, Ste. 700 Alexandria, VA 22314-1561	703-739-0300 703-836-1608 fax	hoggarth@pcia.com
Charles H. N. Kallenbach 2 <sup>nd</sup> Century Communications General Counsel	Competitive LECs 6/99 – 5/01	1100 Wilson Blvd, Fl. 12 Arlington, VA 22209	703-292-3006 703-292-3008 fax	chkallenbach@2ndCentury.com
<b>Anne F. La Lena, Chair</b> MCI WorldCom, Policy Advisor – Federal Law and Public Policy	Domestic IXCs 1/99 – 12/00	1801 Pennsylvania Avenue, NW Washington, DC 20006	202-887-3847 202-887-3866 fax	anne.lalena@wcom.com
Bernadette Lewis, CANTO Technical Manager	Non-Domestic Carriers 5/99 – 4/01	67 Picton Street Newtown, Port of Spain Trinidad & Tobago, WEST INDIES	868-622-5582 868-622-3751 fax	techmgr@canto.org
VACANT APT	Consumer Groups 1/99 – 12/00	919 18 <sup>th</sup> Street NW, Fl. 10 Washington, DC 20006	202-408-0831 202-408-1134 fax	@apt.org Contact Debbie Goldman 202-434-1194 Debbie@cwa-union.org
Robert McDowell, CompTel V. P. & Assistant General Counsel	Domestic IXCs 1/99 – 12/00	1900 M Street, NW, Ste. 800 Washington, DC 20036-3508	202-296-6650 202-296-7585 fax	rmcdowell@comptel.org
L. F. Mevel, CRT & TC Manager, Technical Analysis	State & International Regulatory Bodies 4/98 – 3/00	Telecommunications Branch Ottawa, Ontario, CANADA K1A 0N2	819-997-4596 819-953-0795 fax	leo.mevel@crtc.gc.ca
Floyd Olson Independent Consultant	Domestic ILECS 4/98 – 3/00	13636 Montclair Drive Omaha, NE 68144	402-333-3959 402-333-6926 fax	folson@gpcom.net
<b>Mary Retka, Vice-Chair</b> US West, Dir. - Network Planning	Domestic ILECS 4/98 – 3/00	700 West Mineral Avenue, MN.G20.13 Littleton, CO 80120	303-707-7000 303-707-9577 fax	mretka@uswest.com
Jacques R. Sarrazin, President Canadian LNP Consortium	Non-Domestic Carriers 4/98 – 3/00	6 Eagle Chase Court Nepean, ON, Canada, K2J 3N5	613-823-0144 613-823-1169 fax	jr.sarrazin@sympatico.ca
VACANT NARUC	State & International Regulatory Bodies /00 - /02			Contact Brad Ramsay 202-898-2207 ramsay@naruc.org

Exhibit 2

6607 Willow Lane  
Mission Hills, Kansas 66208  
May 3, 2000

Mr. John Ricker  
Chief Executive Officer  
North American Numbering Plan Billing and Collection Agent

Dear John,

The North American Numbering Council (NANC) requests NBANC to do the following regarding Fiscal Year 2001 (FY2001) billing and collecting activity:

- Reduce by 50 percent the \$8.2 million being collected for pooling administration;
- Reduce by 50 percent the \$700,000 being collected for audits and
- Increase by \$203,000 (an estimate of possible first year costs for what is referred to as the COCUS Replacement Tool) the sum to be collected from U.S. carriers.

Further, the NANC directs NBANC to:

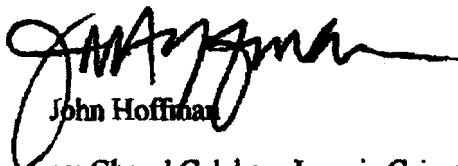
- Refund any excess money billed from carriers who paid in full and
- Reduce amounts billed to carriers on a monthly basis if,
- After the addition of the COCUS Replacement Tool estimate and the 50-percent subtraction in the amounts billed for audits and pooling administration for FY 2001, a decrease results in the amounts carriers should be billed for FY 2001.

Finally, the NANC informs the NBANC that it has the authority to exercise discretion regarding use of monies collected for specific numbering administration functions or related activities, such as pooling administration, audits and the COCUS Replacement Tool, should underpayments occur in one category and larger payments are needed in another.

NBANC shall immediately advise the NANC and the Cost Recovery Working Group concurrently as the appearance of such need arises. Unless directed otherwise by the NANC or its agent, NBANC shall as necessary have recourse to the entire amount for payment of any numbering administration activity it is required to pay.

If any questions arise regarding this letter please do not hesitate to contact me.

Sincerely,



John Hoffman  
cc: Cheryl Calahan, Jeannie Grimes, Les Selzer  
NANC Members

## ADJUSTMENTS TO 2000 FUNDING YEAR CONTRIBUTION FACTOR

EXHIBIT 3

Line		As Filed 11/22/99 (a)	Source (b)	Adjustment (c)	Proposed Revision (d)
<b>Revenue Base</b>					
1	1999 End User Billed Revenue- State/Interstate/International		FCC Form 499A		\$ 216,099,417,916.60
2	Funding Period Revenue Base	\$ 270,568,412,863.00	Line 1d x 16/12		\$ 288,132,557,222.13
3	growth in revenue base		Line 2d / 2a -1		6.49%
<b>Funding Requirement</b>					
4	NANPA	\$ 6,536,667.00	NBANC 11/29/99	\$ -	\$ 6,536,667.00
5	NBANC	\$ 440,833.00	NBANC 11/29/99	\$ -	\$ 440,833.00
6	1K Pooling	\$ 8,200,000.00	NANC 5/3/00	\$ (4,100,000.00)	\$ 4,100,000.00
7	Audits	\$ 700,000.00	NANC 5/3/00	\$ (350,000.00)	\$ 350,000.00
8	COCUS Replacement Vehicle	\$ -	NANC 5/3/00	\$ 203,000.00	\$ 203,000.00
9	NBANC Contingency	note \$ 425,000.00	NBANC Board Resolution 5/4/00	\$ 575,000.00	\$ 1,000,000.00
10	Total Requirement	\$ 15,877,500.00	Ln 10a - (Sum Ln 4 to Ln9)	\$ (3,672,000.00)	\$ 12,630,500.00
11	International Contribution	\$ 211,563.00	NBANC 11/29/99	\$ -	\$ 211,563.00
12	Domestic Rqmt.	\$ 15,665,937.00	Ln 10d - Ln 11d		\$ 12,418,937.00
13	minimum contributions	\$ 59,660.00	\$33.33 x min contributors		\$ 73,159.35
14	revenue from contrib factor	\$ 15,606,277.00	Ln 12d - Ln 13d		\$ 12,345,777.65
15	contribution factor	0.000057680	Ln 14d / Ln 2d		0.000043

note- \$425,000 was not included in funding requirement as it represented funds held for contingencies.

**Exhibit 4**

6607 Willow Lane  
Mission Hills, Kansas 66208

April 28, 2000

Mr. Lawrence Strickling  
Chief, Common Carrier Bureau  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Dear Larry:

Paragraph 56 of the FCC's Number Resource Optimization Order and Further Notice of Proposed Rulemaking, released March 31, 2000, directed the North American Numbering Council (NANC) to consult with the North American Numbering Plan Administrator to develop a cost estimate for a COCUS replacement tool. The NANC was to report that estimate to the Common Carrier Bureau within 30 days of the release of the Order.

Accordingly, the NANC at its April 25-26 meeting agreed upon a high level cost estimate of \$203,000 (Two hundred three thousand dollars). This cost estimate, which was developed by the NANC's Cost Recovery Working Group (CRWG), is only for possible first year costs for the COCUS replacement tool. The CRWG further noted in its submission to the NANC that numerous questions remained which could affect the final cost of the COCUS replacement tool.

If I can provide any other information or you have any questions regarding the estimate, please do not hesitate to contact me.

Sincerely,

John R. Hoffman  
NANC Chair

cc: Cheryl Callahan, Jeannie Grimes  
NANC Members

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing filing was served this 5<sup>th</sup> day of May, 2000, by mailing copies thereof by United States Mail, first class postage paid, or by hand delivery, to the persons listed below.

*Robert Falkner*

---

Robert Falkner

The following parties were served:

Magalie Roman Salas\*  
Office of the Secretary  
445 Twelfth St., SW  
Room TW-A325  
Washington, DC 20554  
(Original and four copies)

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Chair, NANC  
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Mission Hills, KS 66208

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